

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

NORTHEAST ORGANIC FARMING
ASSOCIATION OF NEW YORK,
NATURAL RESOURCES DEFENSE
COUNCIL, and ENVIRONMENTAL
WORKING GROUP,

Plaintiffs,

v.

U.S. DEPARTMENT OF AGRICULTURE,

Defendant.

Civil Action No. 1:25-cv-01529
(MMG)

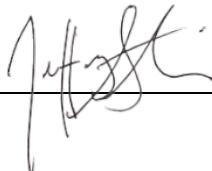
NOTICE OF PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION

PLEASE TAKE NOTICE THAT Plaintiffs Northeast Organic Farming Association of New York, Natural Resources Defense Council, and Environmental Working Group respectfully move, under Federal Rule of Civil Procedure 65(a), for a preliminary injunction ordering Defendant U.S. Department of Agriculture to restore all webpages that it unlawfully removed pursuant to its January 30, 2025, directive to archive or unpublish climate-change-focused webpages and enjoining it from removing or substantially modifying additional webpages pursuant to that directive. In support of this Motion, Plaintiffs rely on the following documents:

- (1) Memorandum of Law in Support of Plaintiffs' Motion for a Preliminary Injunction;
- (2) Declaration of Marcie Craig;
- (3) Declaration of Corinne Hansch;
- (4) Declaration of Jeffrey McManus;
- (5) Declaration of Garrett Rose; and
- (6) Declaration of Anne Schechinger.

Dated: March 17, 2025

Respectfully submitted,



Jeffrey Stein*
Peter Lehner (PL2290)
Earthjustice
48 Wall Street, 15th Floor
New York, New York 10005
(212) 845-7376
jstein@earthjustice.org

Carrie Apfel (4401790)
Earthjustice
1001 G St. NW, Ste. 1000
Washington, D.C. 20001
(202) 667-4500
capfel@earthjustice.org

Stephanie Krent (5535414)
Jackson Busch*
Alex Abdo (AA0527)
Knight First Amendment Institute at Columbia
University
475 Riverside Drive, Suite 302
New York, NY 10115
(646) 745-8500
stephanie.krent@knightcolumbia.org

*Application for admission pending

Counsel for Plaintiffs